

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

M2M SOLUTIONS LLC,  
a Delaware limited liability company,

Plaintiff,

v.

MOTOROLA SOLUTIONS, INC., a  
Delaware corporation, TELIT  
COMMUNICATIONS PLC, a United  
Kingdom public limited company, and TELIT  
WIRELESS SOLUTIONS INC., a Delaware  
corporation,

Defendants.

**C.A. No. 12-033-RGA**

M2M SOLUTIONS LLC,  
a Delaware limited liability company,

Plaintiff,

v.

SIMCOM WIRELESS SOLUTIONS CO.,  
LTD., SIM TECHNOLOGY GROUP LTD.,  
MICRON ELECTRONICS L.L.C., and  
KOWATEC CORPORATION,

Defendants.

**C.A. No. 12-034-RGA**

**REBUTTAL EXPERT REPORT OF DR. ALON KONCHITSKY  
RESPONSIVE TO THE SAVOLAINEN REPORT  
REGARDING THE ALLEGED INVALIDITY OF THE '010 PATENT**

violation or a phone number to be used in response to a panic button depression. (Exh. 31, p. 3852, l. 39 – p. 3853, l. 4). Thus, there is no transmission in WO 00/17021 that includes both a coded number and at least one telephone number or IP address.

787. WO 00/17021 neither discloses nor suggests a memory module for storing at least one telephone number or IP address from an authenticated transmission as one of one or more permitted callers if the processing module authenticates the at least one transmission by determining that the at least one transmission includes the coded number. The Court has construed a “permitted caller” as “a telephone number or IP address on a list of numbers that are designed to cause the programmable communicator to accept an incoming call received from that number.” Mr. Savolainen points to a portion of claim 2 of WO 00/17021 that states that “Only after the provision of a valid PIN code will the installed GSM mobile unit permit the user to ... change any of the stored numbers ... of the system.” (Sav. Rep. at App. F, p. 4) (Exh. 31, p. 3857, ll. 14-16). The stored numbers mentioned in claim 2 of WO 00/17021, however, refer back to the stored numbers mentioned in claim 1 of WO 00/17021 from which that claim 2 depends, and the stored numbers in claim 1 of WO 00/17021 are all numbers for outgoing calls. (Exh. 31, p. 3856, ll. 34-40). Storing a number for an outgoing call has nothing to do with whether or not an incoming call is accepted. WO 00/17021 neither discloses nor suggests a list of numbers that are designed to cause a programmable communicator to accept an incoming call. Mr. Savolainen appears to admit that there is no disclosure in WO 00/017021 of a list of numbers that are designed to cause a programmable communicator to accept an incoming call because he attempts to form an obviousness combination with another document, and I refute Mr. Savolainen’s purported obviousness combination in the below section regarding Claim 1 not being obvious.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 7, 2014 in the city of Sea of Galilee, Israel.



Alon Konchitsky